| 1 2 3 4 5 6 7 8 | CHRISTOPHER CHIOU Acting United States Attorney District of Nevada Nevada Bar No. 14853 ALLISON J. CHEUNG, CSBN 244651 Special Assistant United States Attorney 160 Spear Street, Suite 800 San Francisco, California 94105 Telephone: (510) 970-4811 Facsimile: (415) 744-0134 E-Mail: allison.cheung@ssa.gov Attorneys for Defendant | | |
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| 9 | UNITED STATES DISTRICT COURT | | |
| 10 | DISTRICT OF NEVADA | | |
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| 12 | MAIRA MERAZ, | 0 | |
| 13 | Plaintiff, | Case No.: 2:21-cv-01771-VCF | |
| 14 | v.) | STIPULATION TO VOLUNTARY REMAND PURSUANT TO SENTENCE | |
| 15 | KILOLO KIJAKAZI, Acting Commissioner of Social Security, | FOUR OF 42 U.S.C. § 405(g) AND TO ENTRY OF JUDGMENT FOR PLAINTIFF | |
| 16 | |) | |
| 17 | Defendant. | | |
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| 19 | AT 10 MED EDW CHAPATA ATED 1 | | |
| 20 | IT IS HEREBY STIPULATED by and between the parties, through their undersigned | | |
| 21 | attorneys, and with the approval of the Court, that this action be remanded for further administrative | | |
| 22 | action pursuant to the Social Security Act § 205(g), as amended, 42 U.S.C. § 405(g), sentence four. | | |
| 23 | On remand, the Appeals Council will remand the case to an administrative law judge (ALJ) for | | |
| 24 | a new hearing and new decision. | | |
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| 1 | The parties further request that the Clerk of the Court be directed to enter a final judgment in | |
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| 2 | favor of Plaintiff, and against Defendant, re | versing the final decision of the Commissioner. |
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| 4 | Dated: April 15, 2022 | Respectfully submitted, |
| 5 | | ROHFLING & KALAGIAN, LLP |
| 6 | | <u>/s/ Marc V. Kalagian</u> MARC V. KALAGIAN |
| 7 | | (*as authorized via email on April 15, 2022) Attorney for Plaintiff |
| 8 | | Attorney for Frankfir |
| 9 | Dated: April 15, 2022 | Respectfully submitted, |
| 10 | | CHRISTOPHER CHIOU |
| 11 | | Acting United States Attorney |
| 12 | | <u>/s/ Allison J. Cheung</u> ALLISON J. CHEUNG |
| 13 | | Special Assistant United States Attorney Attorneys for Defendant |
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| 17 | | IT IS SO ORDERED: |
| 18 | | IT IS SO ORDERED: |
| 19 | | HON. CAM FERENBACH UNITED STATES MAGISTRATE JUDGE |
| 20 | | 4-15-2022 |
| 21 | | DATED: |
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CERTIFICATE OF SERVICE 1 I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My 2 business address is 160 Spear Street, Suite 800, San Francisco, California 94105. I am not a party to 3 the above-entitled action. On the date set forth below, I caused service of STIPULATION TO 4 VOLUNTARY REMAND PURSUANT TO SENTENCE FOUR OF 42 U.S.C. § 405(g) AND TO 5 ENTRY OF JUDGMENT FOR PLAINTIFF on the following parties by electronically filing the 6 foregoing with the Clerk of the District Court using its ECF System, which provides electronic notice 7 of the filing: 8 Marc Kalagian 9 marc.kalagian@rksslaw.com Attorney for Plaintiff 10 11 Leonard Stone lstone@shookandstone.com 12 Attorney for Plaintiff 13 I declare under penalty of perjury that the foregoing is true and correct. 14 Dated: April 15, 2022 15 /s/ Allison J. Cheung 16 ALLISON J. CHEUNG Special Assistant United States Attorney 17 18 19 20 21 22 23 24 25 26